

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

OMAR HERNANDEZ and HANNAH)	
GOLDEN, individually and on behalf)	
of all others similarly situated,)	No. 20-cv-3010
Plaintiffs,)	
)	Judge Franklin U. Valderrama
v.)	
ILLINOIS INSTITUTE OF)	Magistrate Judge Keri L. Holleb Hotaling
TECHNOLOGY,)	
Defendant.)	

**JOINT MOTION FOR ENTRY OF PROPOSED AGREED
CONFIDENTIALITY ORDER AND STIPULATED PROTOCOL
ON THE DISCOVERY OF ELECTRONICALLY STORED INFORMATION**

Plaintiffs, Omar Hernandez and Hannah Golden, and Defendant, Illinois Institute of Technology (individually “party,” and collectively the “parties”), by their undersigned attorneys, jointly move this Court for the entry of the proposed Agreed Confidentiality Order and Stipulated Protocol on the Discovery of Electronically Stored Information, and in support thereof, state as follows:

1. The parties have agreed that discovery in this matter may include production of confidential documents that warrant protection by a confidentiality order. The parties have negotiated the terms of such an order and submit to the court a proposed confidentiality order attached as Exhibit A.

2. The proposed order attached as Exhibit A is the Model Confidentiality Order for the United States District Court for the Northern District of Illinois as well as redlines showing the parties’ updates. A clean copy of the proposed confidentiality order is attached as Exhibit B.

3. The parties also believe that discovery in this matter will involve the production of electronically stored information and have negotiated a proposed stipulation on the discovery of such materials attached as Exhibit C. The parties likewise request that this Court enter the attached

stipulation, which will govern the parties' production of all electronically stored information in this case.

WHEREFORE, the parties respectfully request that this Court enter the agreed confidentiality order attached hereto as Exhibit A and the Stipulated Protocol on the Discovery of Electronically Stored Information attached as Exhibit B.

PLAINTIFFS OMAR HERNANDEZ
AND HANNAH GOLDEN

By: /s/ Daniel J. Kurowski

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By: /s/ William T. "Toby" Eveland

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on February 7, 2024, the undersigned electronically filed the foregoing **Joint Motion for Entry of Proposed Agreed Confidentiality Order and Stipulated Protocol on the Discovery of Electronically Stored Information** with the Clerk of Court by using the CM/ECF system, which sent notification of such filing to all parties of record.

/s/ Andrew E. Bollinger